

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant

v.

CENTURYLINK COMMUNICATIONS,
LLC,

Respondent.

DOCKET NO. UT-181051

**DECLARATION OF CHARLES W.
STEESE IN SUPPORT OF
CENTURYLINK COMMUNICATIONS,
LLC’S OPPOSITION TO PUBLIC
COUNSEL’S MOTION FOR PARTIAL
SUMMARY DETERMINATION**

- 1* I, Charles W. Steese, do depose on oath and state as follows in support of CenturyLink Communications, LLC’s Opposition to Public Counsel’s Motion for Partial Summary Determination (“Opposition”).
- 2* I am a partner in the law firm of Armstrong Teasdale LLP, and serve as co-counsel for CenturyLink Communications, LLC in this action.
- 3* I have personal knowledge of the following facts and affirm that they are all true and correct.
- 4* *Exhibit 1C* to the Opposition is a true and correct copy of excerpts from the responsive testimony of Martin D. Valence dated March 31, 2022.
- 5* *Exhibit 2C* to the Opposition is a true and correct copy of excerpts from the responsive testimony of Jeanne W. Stockman revised on October 21, 2022.
- 6* *Exhibit 3C* to the Opposition is a true and correct copy of excerpts from the responsive testimony of Carl D. Klein dated March 31, 2022.

Declaration of Charles W. Steese in Support of CenturyLink Communications, LLC’s
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- 7** *Exhibit 4* to the Opposition is a true and correct copy of the FCC Report Narrative dated August 19, 2019.
- 8** *Exhibit 5C* to the Opposition is a true and correct copy of excerpts from the direct testimony of Brian Rosen revised on December 16, 2021.
- 9** *Exhibit 6C* to the Opposition is a true and correct copy of Public Counsel’s responses to CenturyLink’s Data Request Nos. 32, 34, 37, 39 and 45.
- 10** *Exhibit 7C* to the Opposition is a true and correct copy of the 2009 Qwest Communications Company, LLC contract with the Washington Military Department.
- 11** *Exhibit 8C* to the Opposition is a true and correct copy of Amendment M to the contract between Qwest Communications Company, LLC with the Washington Military Department.
- 12** *Exhibit 9C* to the Opposition is a true and correct copy of excerpts from the responsive testimony of Steven E. Turner dated March 31, 2022.
- 13** *Exhibit 10C* to the Opposition is a true and correct copy of the excerpts from the August 17, 2022 deposition of Steven E. Turner.
- 14** *Exhibit 11C* to the Opposition is a true and correct copy of State of Washington E-911 Transition Call Flows between CenturyLink/West-Intrado and Comtech TCS ESInets.
- 15** *Exhibit 12C* to the Opposition is a true and correct copy of Stacy J. Hartman’s testimony exhibit 5C, which is Comtech’s response to Public Counsel’s Data Request No. 4 dated October 18, 2021.
- 16** *Exhibit 13C* to the Opposition is a true and correct copy of Jeanne W. Stockman’s testimony exhibit 12C, which is TeleCommunication System, Inc.’s response to

CenturyLink's Data Request Nos.1-10.

- 17** *Exhibit 14C* to the Opposition is a true and correct copy of excerpts from the August 19, 2022 deposition of Carl D. Klein.
- 18** *Exhibit 15C* to the Opposition is a true and correct copy of excerpts from the October 11, 2022 deposition of Dr. Robert Akl.
- 19** *Exhibit 16* to the Opposition is a true and correct copy of Public Counsel's response to CenturyLink's Data Request 2(a).
- 20** *Exhibit 17* to the opposition is a true and correct copy of a letter from Adam Wasserman with the Military Department to Bruce King at CenturyLink dated January 25, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of November, 2022

By: /s/ Charles W. Steese
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